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Attorneys for Defendants

Halsen Holdings, LLC, South Texas

Associates & Resources, Peninsula Healthcare

Management, LLC, Daniel Brothman, Edith

Brothman, Stacy Sean Fowler, and Edmund C. King

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE

JEREMY ROSENTHAL, as Liquidation Trustee
of the WHC LIQUIDATION TRUST,

Plaintiffs,

v.

HALSEN HOLDINGS, LLC, a California limited
liability company; SOUTH TEXAS
ASSOCIATES & RESOURCES, a California
corporation; PENINSULA HEALTHCARE
MANAGEMENT, LLC, a Nevada limited
liability company; DANIEL BROTHMAN, an
individual; EDITH BROTHMAN, an individual;
STACY SEAN FOWLER, an individual; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 5:23-cv-06216-PCP

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINES
TO ANSWER COMPLAINT, MEET
AND CONFER, FILE INITIAL
DISCLOSURES, FILE RULE 26(f)
REPORT, AND CONTINUING
CASE MANAGEMENT CONFERENCE**

Complaint Filed: December 1, 2023

Trial Date: None

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff, Jeremy Rosenthal (“Plaintiff”), and Defendants, Halsen Holdings, LLC, et al. (“Defendants” and together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

WHEREAS, on December 4, 2024, this Court entered an Initial Scheduling Order (“Order”) (Dkt. #5), setting deadlines for the parties to meet and confer regarding initial disclosures, early settlement, ADR process selection, and a discovery plan by February 13, 2024. The Order required the parties to file a Rule 26(f) Report, complete initial disclosures, and file a Case Management Statement by February 27, 2024. The Order scheduled the Initial Case Management Conference (“CMC”) for March 5, 2024 at 9:30 AM. The deadline to file the Case Management Statement and the date of the CMC were reset by the Court and are now set for February 29, 2024 and March 14, 2024 at 1:00 PM, respectively (Dkt. #14).

WHEREAS, on January 29, 2024, the Parties participated in a joint conference to discuss case management, including Defendants’ time to respond to Plaintiff’s Complaint, informal disclosure of information, and the possibility of mediation.

WHEREAS, the Parties agreed to extend Defendants’ deadline to file a responsive pleading to Plaintiff’s Complaint from February 2, 2024 to February 9, 2024, with the understanding the Parties would stipulate, subject to the Court’s approval, for an additional 23 days of additional time (i.e., a combined 30 day extension) for Defendants to file a responsive pleading in exchange for Defendants agreeing that, in the event Defendants file any motion(s) in response to the Complaint, Plaintiff will receive an additional 30 days to file his opposition to any such motion(s).

WHEREAS, in light of the Parties’ ongoing discussions, consideration of potential mediation of their dispute, and the mutual desire that each party have additional time to engage in informal discovery to facilitate more informed positions, the Parties jointly request that the Court extend the deadlines established by the Order as follows:

- **Defendants’ Responsive Pleading:** March 4, 2024
- **Plaintiff’s Response to any Motion Filed by Defendants in Response to Complaint:** 44 days after Defendants’ Responsive Motion filing (30-day extension to the 14-day response deadline provided for by Fed. R. Civ. P. 6(d) and Local Rule 7-3(a)).

- **Meet and Confer:** April 15, 2024 (60-day continuance)
- **Rule 26(f) Report:** April 29, 2024 (60-day continuance)
- **Initial Disclosures:** April 29, 2024 (60-day continuance)
- **Case Management Statement:** April 29, 2024 (60-day continuance)
- **Case Management Conference:** May 13, 2024 or the next available date on the Court's calendar (60-day continuance)

Defendants have filed a Declaration in support of this Stipulation as required under Local Rule 6-2(a) and have attached a Proposed Order as Exhibit "A."

IT IS SO STIPULATED.

DATED: February 2, 2024

KAUFMAN DOLOWICH, LLP

By: */s/ Tad A. Devlin*
Tad A. Devlin
Attorneys for Defendants
Halsen Holdings, LLC, South Texas
Associates & Resources, Peninsula Healthcare
Management, LLC, Daniel Brothman, Edith
Brothman, Stacy Sean Fowler, and Edmund C. King

DATED: February 2, 2024

PERKINS COIE, LLP

By: */s/ Paul S. Jasper*
Paul S. Jasper
Attorneys for Plaintiff
Jeremy Rosenthal, as Liquidation
Trustee of the WHC Liquidation Trust